QA Program Changes

QAMP

QARD

AQAP

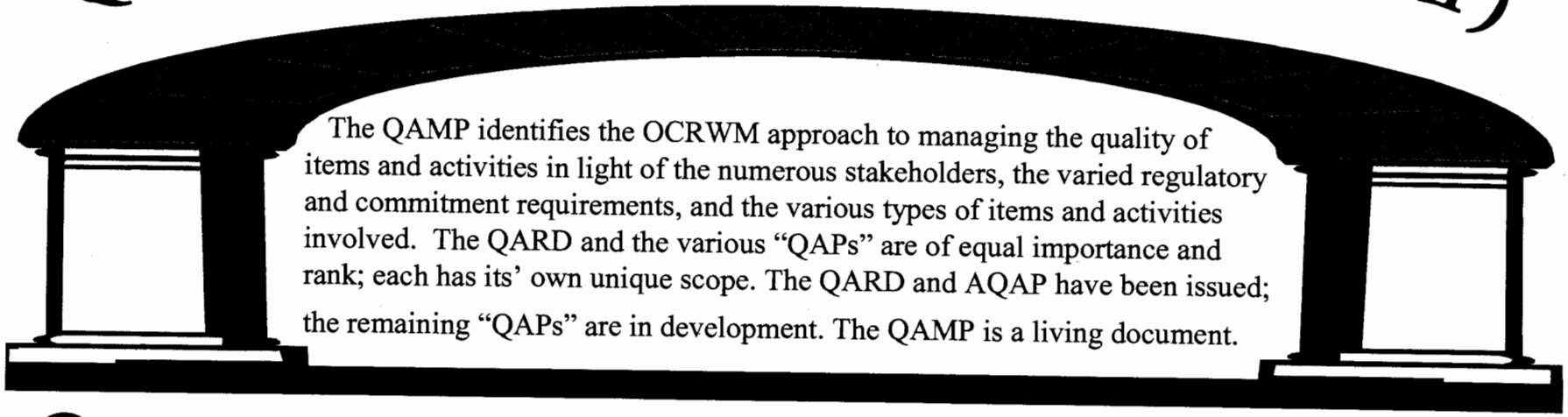
CQAP

WCQARS

Industry Approach

- Multiple QA Programs that focus on specific activities and functions. Typically:
  - Safety-Related & EQ Program – NRC Regulated
  - Augmented QA Programs– Non-SR
    - Health Physics, ALARA – 10 CFR Part 20
    - Transport of Rad Waste – Part 71 Casks, DOT 49CFR
    - Fire Protection – 10 CFR 50, Appendix R (NRC)
    - Station Blackout
    - Repairs and Alterations – (ASME Section XI)
    - Environmental Management
    - Security

Quality Assurance Management Policy (QAMP)



The QAMP identifies the OCRWM approach to managing the quality of items and activities in light of the numerous stakeholders, the varied regulatory and commitment requirements, and the various types of items and activities involved. The QARD and the various "QAPs" are of equal importance and rank; each has its' own unique scope. The QARD and AQAP have been issued; the remaining "QAPs" are in development. The QAMP is a living document.

QARD — *QARD 10CFR63 - Repository* — Revision 17

CQAP — *Cask Acquisition and Fleet Maintenance Facility QA Plan* — Under Development

WCQARS — *Waste Custodian QA Requirements Spec* — Under Development

AQAP — *Augmented QA Program (AQAP), DOE O 414.1B - (BOP QA)* — Revision 0 Issued

QAMP

- The "Overall OCRWM QA Program"
- Describes Multiple QA Programs
- Decouples the QARD from other changes.
- QA Programs focused on specific function, items, activities, or source documents.
- Addresses Part 63 and Non-Part 63 items and activities.
- May result in multiple procedures and procedure changes.

Changes to the QARD

- Revision 14 – Previous QARD Baseline.
- Revision 15 – Changes to Corrective Action Process. Transferred some requirements to the AQAP and other QA Documents.
- Revision 16 – Organizational Changes – OQA Reporting to ORD and RW-1. QARD applies to ORD
- Revision 17 – Comply with 10 CFR Part 63 -OQA does not have to review organizational procedures. An independent individual (non-QA) trained and qualified in QA Practices and Concepts can perform the review.

AQAP

- DOE Order 414.1B based. Applies to:
  - ISM Program and activities.
  - Suspect/Counterfeit Item requirements
  - Activities removed from QARD, like fire protection; occupational exposure; normal (non-Part 63) operating activities.
  - S&T activities. Need to be careful with data, software, models that may require additional qualification later.
- Allows Grading of QA controls, provided there is an adequate process and adequate rationale.
- DOE Order 414.1B CRD needs to be passed on to Suppliers (Graded).

CQAP

- Cask Acquisition/Fleet Maintenance (FMF) QA Program
- Covers acquisition and oversight of: (1)10 CFR Part 71 Casks and (2) the Transport and Fleet Maintenance Facility (FMF) items and activities.
- Acquisitions are Based on DOE O 414.1B requirements.
- The 10 CFR Part 71 requirements are met by Contractors that have an NRC approved QA Program.
- The CQAP only covers the acquisition and oversight.

Waste Custodian QA Requirements Spec

- Waste Custodian QA Requirements (WCQARS)
- This is a QA Specification (Based primarily on the requirements of the QARD) that RW through EM (EM sites and maybe others, e.g., NE) contractually will require sites to meet.
- Sites work to own QA Program that meets the WCQARS.

Status

- QAMP is out for Concurrence Review.
- QARD Revision 17 has been issued and submitted to the NRC, preliminary comments received.
- AQAP Revision 0 has been issued. Revision 1 is in work to revise the applicability section & for 414.1B.
- The CQAP is being developed and will be based upon DOE Order 414.1B.
- The WCQARS is in work and will be based upon the QARD with RW specifics removed.

Summary

- Several Focused QA Programs instead of one.
  - QARD, AQAP, CQAP, WCQARS.
  - These address Waste: Preparation, Acceptance, Transport, and Isolation.
- Benefits:
  - The QA Program can be more specific to the function, organization, and upper-tier source documents.
  - Decouples the Repository License QA Program from being revised due to non-License source document changes.
  - Provides QA requirements for "non-Q" items and activities.
- Potential Downside:
  - Potential applicability confusion.
  - Potential multiple procedures for the same activity.